

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

<p>IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION</p> <p>This Document Relates To:</p> <p><i>People of the State of California, et al. v. Meta Platforms, Inc., et al.</i></p>	<p>MDL No. 3047</p> <p>Case Nos.: 4:22-md-03047-YGR (PHK) 4:23-cv-05448-YGR</p> <p>JOINT LETTER RE SCHEDULES FOR STATE AG AND AGENCY DOCUMENT PRODUCTION</p> <p>Judge: Hon. Yvonne Gonzalez Rogers Magistrate Judge: Hon. Peter H. Kang</p>
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Dear Judge Kang:

Pursuant to the Court’s instructions at the December 11, 2024 Discovery Management Conference that document production schedules be submitted for the agencies who were subject to the Parties’ December 9, 2024 Joint Letter Brief on state agency discovery disputes (ECF No. 1430), Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta”) and the undersigned counsel for the States and/or their agencies respectfully submit this letter concerning such document production schedules. *See, e.g.*, Hr’g Tr. at 118:6-11 (Dec. 11, 2024) (“I’m going to be ordering everyone to be providing a one-page schedule to get this done . . .”); *id.* at 118:18-21 (“I’m going to order all the agencies who are waiting to talk to me to submit a one-page schedule for getting things done with Meta”); *id.* at 170:4-12 (confirming that the Wednesday schedule submission deadline applies to all States subject to the December 9, 2024 briefing); *see also id.* at 103:4-6 (“It’s just a schedule. I don’t want argument.”).

Dated: December 18, 2024

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SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – ARIZONA

Meta's Position: Meta proposed the following schedule to Arizona on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).¹

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Arizona's Position: At this time, the four Arizona agencies still at issue (the Arizona Department of Education, Board of Education, Department of Child Safety, and Department of Health Services) are unable to commit to substantial completion of production of documents requested pursuant to Rule 34 by January 17, 2025, as Meta proposes. The Arizona Attorney General's Office has engaged a discovery vendor to work through technical resource staffing and other inherent constraints and limitations faced by Arizona agencies. Meta and Arizona have failed to reach agreement on search terms and the resultant universe of documents to be reviewed for production. Absent this information, the Arizona agencies have no basis to propose a schedule and will not make an empty promise to this Court regarding the timeline within which discovery can be completed.

¹ Per the Court's instructions, Meta includes no argument in response to the State's position. See Hr'g Tr. at 103:4-6 (Dec. 11, 2024) ("It's just a schedule. I don't want argument.").

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – CALIFORNIA

Meta's Position: Meta proposed the following schedule to California on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Certain California Agencies's Position: California Health and Human Services Agency (CalHHS), Department of Health Care Services (DHCS), Mental Health Services Oversight and Accountability Commission (MHSOAC)

Date	Event
December 18, 2024	Deadline to agree on search terms and custodians for CalHHS and MHSOAC
December 20, 2024	Deadline to agree on search terms and custodians, or alternative collection and review plan, for DHCS. Further deadlines for DHCS are contingent upon agreement to a hit count that is broadly consistent with the hit count of the proposal at ECF 1430-2 at 14-15.
January 10, 2025	Deadline for rolling document productions to begin
February 7, 2025	Deadline for substantial completion of document productions
February 14, 2025	Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)
February 21, 2025	Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions
April 4, 2025	Deadline for Meta to complete all depositions

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – COLORADO

Meta's Position: Meta proposed the following schedule to Colorado on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Colorado's Position: Colorado Governor's Office, BHA, CDHS, CDHE, OSPB, and CDE

Date	Event
December 13, 2024	Meta provided 85 revised search strings to accommodate previously disclosed technical limitations of Colorado agencies.
December 16, 2024	Colorado agencies began running revised search strings.
December 20, 2024	Hit reports for Colorado agencies* will be provided.
January 6, 2025	Complete negotiations of final search terms for production based on hit reports.
January 13, 2025	Rolling production to begin on finalized search terms. If Parties fail to agree on search terms, Colorado will initiate additional hit reports and production on final Colorado proposal to ensure production can proceed.
February 7, 2025	Substantial completion of production for State AG and state agency documents pursuant to Colorado counterproposal
February 14, 2025	Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)
February 21, 2025	Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions
April 4, 2025	Deadline for Meta to complete all depositions

*CDHE may require minimal additional time due to IT staffing issues. Counsel will keep Meta informed of this agency's progress.

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – CONNECTICUT

Meta's Position: Meta proposed the following schedule to Connecticut on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Connecticut's Position:

Agency	Search Term Finalization Date*:	First Custodian Production Date (or Rolling Production to Begin):	Substantial Completion Date* (all docs):
CT Office of the Governor	12/20/24	1/10/25	1/17/25
CT Department of Children and Families	12/20/24 (targeted search process finalization)	1/10/25	1/17/25
CT Department of Education	12/20/24	1/10/25	1/17/25
CT Commission for Educational Technology	N/A	Rule 45 Subpoena Completion on 10/9/24	N/A

*This date represents the latest date for the identified agency to commence the review and production process. The agency will work off its proposed search term list unless an alternative agreement with Meta is reached or a Court order requiring alternative terms issues.

*This Substantial Completion Date does not include responses to Meta's Third Request for Production of Documents, dated November 18, 2024. The parties each reserve all rights with respect to the deadline for substantially completing production in response to Meta's Third Request for Production of Documents.

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – DELAWARE²

Meta's Position: Meta proposed the following schedule to Delaware on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
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Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Delaware's Position: Delaware proposed the following schedule to Meta on December 16, 2024.

Date	Event
12/23/2024	Deadline to complete meet and confers regarding search terms for Delaware agencies.
1/8/2024	Delaware agencies to begin second round of rolling productions.
2/6/2025	Substantial completion of production for Delaware agencies. ³

² Per the Court's instructions, the parties include no argument. *See* Hr'g Tr. at 103:4-6 (Dec. 11, 2024) ("It's just a schedule. I don't want argument.").

³ Assuming the parties' agreement on a reasonable set of search terms.

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – HAWAII

Meta's Position: Meta proposed the following schedule to Hawaii on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Hawaii's Position: Hawaii's Proposed Discovery Schedule for State Agency Production

Date	Event
12/31/2024	Deadline for Parties to complete meet and confers regarding remaining search terms to be used for Rule 34 state agency discovery
1/10/2025	Hawai'i agencies to begin next round of rolling productions.
2/28/2025	Substantial completion of production for Hawai'i agencies.

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – ILLINOIS

Meta's Position: Meta proposed the following schedule to Illinois on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Illinois's Position: Illinois Attorney General, Governor's Office, DHS, DCFS, ISBE, and IDPH

Date	Event
December 13, 2024	Illinois provided search term and custodian counterproposal for all state agencies
December 16, 2024	Illinois began export of custodial mailboxes
TBD – after full custodial mailboxes have been exported and processed into eDiscovery platform	If Parties fail to agree on search terms and custodians, Illinois will produce additional hit reports from eDiscovery platform when custodial mailboxes loaded. Illinois will begin document review and production based on final Illinois counterproposal.
January 10, 2025	Last day for rolling document productions to begin
February 7, 2025	Substantial completion of production for State AG and state agency documents pursuant to Illinois counterproposal
February 14, 2025	Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)
February 21, 2025	Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions
April 4, 2025	Deadline for Meta to complete all depositions

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – INDIANA

Meta's Position: Meta proposed the following schedule to Indiana on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Indiana's Position:

Date	Event
December 23, 2024	Deadline for Parties to complete meet and confers regarding search terms to be used for Rule 34 state agency discovery
January 8, 2025	Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions
January 10, 2025	Start date for rolling productions of state agency custodian documents requested pursuant to Rule 34
February 7, 2025	Substantial completion of production for State AG and state agency documents
February 14, 2025, through March 14, 2025	Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – KANSAS

Event	DMO 12	Meta Proposal	Kansas Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24	12/23/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24	
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24	2/7/25 (concurrent with Rule 34 deadline)
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24	Strike this
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24	
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25	1/10/25
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (<i>and</i> to meet and confer re: any such disputes)	1/6/25	1/6/25	1/8/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25	
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25	2/7/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25	
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – KENTUCKY

Event	DMO 12	Meta Proposal	Kentucky Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24	12/20/24
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24	12/23/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24	1/10/25
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24	12/30/24, but 2/14/25 (per DMO 12) for deadline to object to said depositions.
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25	n/a
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (<i>and</i> to meet and confer re: any such disputes)	1/6/25	1/6/25	1/6/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25	1/13/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25	2/7/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25	2/3/25-3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	4/4/25

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – LOUISIANA

Event	DMO 12	Meta Proposal	Louisiana Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24	12/23/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24	12/20/24
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24	12/23/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24	1/10/25
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24	1/6/25
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25	1/3/25
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (<i>and</i> to meet and confer re: any such disputes)	1/6/25	1/6/25	1/6/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25	1/13/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25	1/31/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25	2/3/25- 3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	4/4/25

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – MAINE

Meta's Position: Meta proposed the following schedule to Maine on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Maine's Position: Maine proposes the following schedule for completion of state agency discovery. This proposal applies to the Department of Administrative and Financial Services, Department of Education, Department of Health and Human Services, and the Governor's Office. Meta has agreed to de-prioritize discovery from the Department of Economic and Community Development.

Date	Task
December 23, 2024	Complete meet and confers on search terms and custodians
December 30, 2024	Deadline for letter briefs on search terms and custodians
January 10, 2025	Deadline to begin rolling productions
February 14, 2025	Deadline for substantial completion of production
February 28, 2025	Earliest date for 30(b)(6) deposition

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – MICHIGAN

Meta's Position: Meta proposed the following schedule to Michigan on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Michigan's Position: Michigan's proposal below is contingent on Meta's acceptance of outstanding, good-faith proposal for search terms dated December 18, 2024, and requests to de-prioritize certain agencies.

Date	Event
TBD – failing agreement on search terms and custodians	As necessary, Michigan will produce additional hit reports from eDiscovery platform when available. Once Meta confirms acceptance of Michigan's final search term proposal, Michigan will promptly begin document review and production.
January 17, 2025	Last day for rolling document productions to begin
February 7, 2025	Substantial completion of production for State AG and state agency documents pursuant to Michigan counterproposal
February 14, 2025	Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)
February 21, 2025	Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions
April 4, 2025	Deadline for Meta to complete all depositions

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – MINNESOTA

Meta's Position: Meta proposed the following schedule to Minnesota on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).⁴

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Minnesota's Position: DHS, MDE, and the Governor's Office sent Meta counterproposals accompanied by hit reports and explanations for the same. Meta responded the day of this filing, and the negotiations are ongoing as to DHS and MDE. The Governor's Office accepted Meta's 12/18/24 counterproposal. Accordingly, the MN AGO, on behalf of DHS, MDE, and the Governor's Office, propose the following deadlines to complete state agency discovery:

12/20/24	Search Term Finalization Date. This date represents the latest date for DHS, MDE, and the Governor's Office to commence the review and production process. The agency will work from its proposed search term list unless an alternative agreement with Meta is reached or a Court order requiring alternative terms issues.
1/10/25	Rolling Production to Begin.
2/7/25	Substantial Completion Date. DHS cannot currently evaluate the adequacy of this date due to ongoing search term negotiations. DHS, MDE, and the Governor's Office reserve all rights to seek relief from this deadline if the parties do not reach agreement on reasonable search terms.

MN AGO objects to Meta's proposed schedule to the extent that it would impose different deadlines on agencies not at issue for purposes of this submission or includes its third set of requests for production. MN AGO further objects to Meta's proposed deposition schedule. MN AGO cannot meaningfully negotiate deposition deadlines until the scope of the agencies' search and production is finalized. Meta's proposed deposition schedule is also duplicative (e.g., Meta's 12/30/24 deadline is duplicative of deadlines in DMO 12) and serves only to impose burdensome and unnecessary obligations on the States, and should not be adopted.

⁴ Per the Court's instructions, Meta includes no argument in response to the State's position. See Hr'g Tr. at 103:4-6 (Dec. 11, 2024) ("It's just a schedule. I don't want argument.").

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – MISSOURI

Meta's Position: Meta proposed the following schedule to Missouri on December 17, 2024, and did not receive any proposed dates from Missouri.

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (<i>and</i> to meet and confer re: any such disputes)	1/6/25	1/6/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – NEBRASKA

Meta's Position: Meta proposed the following schedule to Nebraska on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).⁵

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Nebraska's Position: Nebraska's state agencies did not have infrastructure to run hit searches previously. Nebraska is working with state IT personnel to build and develop search functionality for some databases and working on alternative solutions for searching certain databases that present additional technical challenges. Some agencies are alternatively providing methodologies for manual searches. Nebraska has proposed the below compliance deadlines for the Department of Education, the Children's Commission, and the Governor's Office.⁶ The Department of Health and Human Services is not included DHHS already has fully complied with Meta's requests. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Date	Event
December 16, 2024	Nebraska provided available hit reports
January 3, 2025	Department of Education to begin exporting and processing documents.
January 10, 2025	Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (and to meet and confer re: any such disputes)
January 14, 2025	Substantial Compliance from the Nebraska Governor's Office, including disclosures of the search process
January 31, 2025	Rolling Production to begin for the Department of Education and the Children's Commission pursuant to Nebraska's counterproposal
February 28, 2025	Substantial Compliance from the Department of Education and the Children's Commission pursuant to Nebraska's counterproposal

⁵ Per the Court's instructions, Meta includes no argument in response to the State's position. *See* Hr'g Tr. at 103:4-6 (Dec. 11, 2024) ("It's just a schedule. I don't want argument.").

⁶ Assuming the Parties' agreement on search terms. If the Parties are unable to reach an agreement on search terms, Nebraska will begin document review and production based on the final Nebraska counterproposal.

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – NEW JERSEY

Event	DMO 12	Meta Proposal	New Jersey Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24	12/27/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24	1/6/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24	n/a, covered by R34 prod.
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24	1/15/25
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24	12/30/25
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25	2/5/25
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (<i>and</i> to meet and confer re: any such disputes)	1/6/25	1/6/25	1/13/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25	1/20/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25	2/28/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25	2/3/25- 3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	4/4/25

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – NEW YORK

Meta's Position: Meta proposed the following schedule to New York on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

New York's Position: While the New York agencies all maintain their objections and stand by their legal positions (*see, e.g.*, Dkt. No. 1443), with the exception of one agency that has been deprioritized, all of the New York agencies identified in the Rule 34 subpoena issued by Meta have agreed to produce documents pursuant to Rule 45. These include, the Council on Children and Families, the Department of Education, the Department of Health, the Department of State, the Office of Children and Family Services, the Office of Mental Health, the Division of the Budget and the Office of the Governor. The proposal from OAG set forth below is an estimate based on a review of the document hits generated by the most recent proposals from the New York agencies and not the hits generated by Meta's most recent terms.

Date	Event
12/23/2024	Deadline to complete meet and confers regarding search terms and custodians for New York agencies.
12/27/2024	Letter briefs on search terms and custodians for New York agencies (if necessary).
12/30/2024	New York agencies to begin next round of rolling productions.
2/14/2025	Substantial completion of production for New York agencies.
2/28/2025 – 3/7/2025	Dates for Rule 30(b)(6) depositions of New York agencies to be taken (unless otherwise agreed upon by the Parties).

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – NORTH CAROLINA

Meta's Position: Meta proposed the following schedule to North Carolina on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

North Carolina's Position: North Carolina proposes the below schedule:

Date	Event(s)
Jan. 3, 2025	Completion of conferrals re: search terms and custodians for DPI covering the period 1/1/12 to 12/31/16. ⁷
Jan. 8, 2025	Deadline for conferrals re: scheduling AG and agency 30(b)(6) depositions.
Jan. 10, 2025	Rolling production begins for DPI documents for the period 1/1/17 to 3/28/24, and Governor's Office documents.
Jan. 13, 2025	Deadline for letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions.
Jan. 17, 2025	Rolling production to begin for any DPI documents for the period 1/1/12 to 12/31/16, and DHHS documents for the time period 1/1/2017 to 3/28/2024. Completion of conferrals regarding any search terms and custodians for DHHS for the period of 1/1/12 to 12/31/16.
Jan. 24, 2025	Substantial completion of production for documents from the Governor's Office, and for DPI documents for the time period 1/1/17 to 3/28/24.
Jan. 31, 2025	Substantial completion for DHHS dating 1/1/17 to 3/28/24, and any DPI documents dating 1/1/12 to 12/31/16.
Feb. 14, 2025	Substantial completion for any DHHS documents dating 1/1/12 to 12/31/16.
Feb. 14, 2025	Deadline for Meta to serve fact witness depositions.
March 14, 2025	Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and stage agency fact witness depositions.

⁷ NCAG maintains its objection to the propriety of this earlier time period but is willing to continue conferrals.

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – OHIO

Event	DMO 12	Meta Proposal	Ohio Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24	12/30/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24	1/6/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24	12/23/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24	1/10/25
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24	1/6/25
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25	n/a
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (<i>and</i> to meet and confer re: any such disputes)	1/6/25	1/6/25	1/17/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25	1/24/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25	2/7/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25	2/3/25- 3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	4/4/25

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – PENNSYLVANIA

Event	DMO 12	Meta Proposal	Pennsylvania Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24	1/3/25
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24	1/10/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24	12/23/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24	1/31/25
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25	2/14/25
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (<i>and</i> to meet and confer re: any such disputes)	1/6/25	1/6/25	1/13/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25	1/20/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25	2/28/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25	2/3/25- 3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	4/4/25

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – RHODE ISLAND

Meta's Position: Meta proposed the following schedule to Rhode Island on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

Rhode Island's Proposal:

Date	Event
12/20/2024	Expected completion for conferrals regarding agency custodians and ESI search terms
1/8/2024	Rhode Island agencies to begin rolling productions.
2/26/2025	Substantial completion for agency productions ⁸
3/5/2025	Deadline to notice agency depositions
4/4/2025	Deadline for Meta to complete agency depositions

⁸ This proposed substantial completion deadline assumes the parties and agencies can reach an agreement regarding custodians and search terms by December 20, 2024.

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – SOUTH DAKOTA

Meta's Position: Meta proposed the following schedule to South Dakota on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25

South Dakota's Position:

Agency	Search Term Negotiation Status:	Search Term Finalization Date*:	Rolling Production to Begin:	Substantial Completion Date (all docs):
AG	Partially Agree	12/31/24	01/10/25	02/14/25
BOR	Partially Agree	12/31/24	01/10/25	02/14/25
DOH	Partially Agree	12/31/24	11/4/24	02/14/25
DOE	Partially Agree	12/31/24	01/10/25	02/14/25
DSS	Partially Agree	12/31/24	01/10/25	03/31/25
GO	Partially Agree	12/31/24	01/10/25	02/14/25
BFM	Partially Agree	12/31/24	01/10/25	02/14/25

SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – WASHINGTON

Event	Meta Proposal	Washington Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	n/a
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/18/24 (DMO 12: 12/2/24)	n/a. Parties have met & conferred.
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/20/24 (DMO 12: 12/9/24)	1/13/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24 (Per DMO 12)	2/10/25
Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	12/27/24 (DMO 12: 12/6/24)	No objection.
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	12/30/24	No objection. Subject to future negotiations.
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	1/3/25	1/10/25
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (<i>and</i> to meet and confer re: any such disputes)	1/6/25 (Per DMO 12)	2/14/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25 (Per DMO 12)	2/19/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/17/25 (DMO 12: 1/10/25)	2/10/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25 (Per DMO 12)	2/24/25- 3/17/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)	2/14/25 (Per DMO 12)	No objection. Subject to future negotiations and production status.
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25 (Per DMO 12)	No objection. Subject to future negotiations and production status.
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25 (Per DMO 12)	No objection. Subject to future negotiations
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25 (Per DMO 12)	No objection. Subject to future negotiations and production status.

SCHEDULE FOR COMPLETION OF STATE AGENCY DISCOVERY – WISCONSIN

Event	DMO 12	Meta Proposal	Wisconsin Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	WI objects to inclusion of this entry
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24	12/20/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24	WI objects to inclusion of this entry
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24	WI objects to inclusion of this entry
Deadline for next rolling production of state agency documents requested pursuant to Rule 34	n/a	12/27/24	1/10/25
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition within 3 business days or providing proposed dates within 7 business days	n/a	12/30/24	WI objects to inclusion of this entry
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25	WI objects to inclusion of this entry
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (<i>and</i> to meet and confer re: any such disputes)	1/6/25	1/6/25	1/6/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25	1/13/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25	2/7/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25	2/3/25- 3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (<i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	4/4/25

ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 18, 2024

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen